

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ABBVIE INC., et al.,

Defendants.

Case Number: 2:14-CV-5151-HB

Plaintiff Federal Trade Commission’s Motion to Compel AbbVie Defendants to Produce Documents Improperly Withheld on Privilege Grounds from their Georgia Privilege Logs

Plaintiff Federal Trade Commission moves to compel Defendants AbbVie Inc., Abbott Laboratories, and Unimed Pharmaceuticals, LLC (together “AbbVie Defendants”) to produce certain documents that they have improperly withheld or redacted on claims of attorney-client privilege and work-product protection. The accompanying memorandum sets forth the grounds for this motion. A proposed order and certification pursuant to Local R. Civ. P. 26.1(f) are also attached.

Dated: June 30, 2016

Respectfully submitted,

/s/ Patricia M. McDermott
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[PROPOSED] ORDER

AND NOW, this ____ day of _____, 2016, upon consideration of Plaintiff Federal Trade Commission’s Motion to Compel AbbVie Defendants to Produce Documents Improperly Withheld on Privilege Grounds from their Georgia Privilege Logs (“FTC’s Motion to Compel”), and any response thereto, it is hereby ORDERED that the FTC’s Motion to Compel is GRANTED.

It is further ORDERED that, within seven days of this Order, Defendants AbbVie Inc., Abbott Laboratories, and Unimed Pharmaceuticals, LLC (“AbbVie Defendants”) must produce to the FTC unredacted versions of all documents listed in Exhibit 1 and 2 to the FTC’s Motion to Compel.

[Or, in the alternative]

It is further ORDERED that, within seven days of this Order, Defendants AbbVie Inc., Abbott Laboratories, and Unimed Pharmaceuticals, LLC (“AbbVie Defendants”) must produce to the FTC unredacted versions of all documents listed in Exhibit 1 and all highlighted documents listed in Exhibit 2 to the FTC’s Motion to Compel.

It is further ORDERED that, within fourteen days of this Order, AbbVie Defendants must review all remaining documents listed in Exhibit 2 and produce to the FTC unredacted versions of any such documents that meet the standards described in the accompanying Memorandum Opinion. If any such document contains material that may, consistent with the holdings in the Memorandum Opinion, continue to be withheld as privileged, AbbVie Defendants may instead produce a version of the document with that information redacted. For any document that AbbVie Defendants continue to withhold or redact, they shall explain specifically in writing how that document is privileged in light of this Court's December 14, 2015 opinion and its memorandum opinion released with this order.

The Honorable Harvey Bartle, III
United States District Court Judge

Certificate of Service

I hereby certify that on June 30, 2016, I caused the Motion to Compel AbbVie Defendants to Produce Documents Improperly Withheld on Privilege Grounds from their Georgia Privilege Logs to be filed with the United States District Court for the Eastern District of Pennsylvania using the ECF system. I certify that I also caused this filing to be served on all counsel of record via electronic mail.

/s/ Patricia M. McDermott
Patricia M. McDermott